

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

AUGUST WILDMAN, *et al.*,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT,
DEUTSCHE BANK TRUST COMPANY
AMERICAS, STANDARD CHARTERED BANK,
STANDARD CHARTERED PLC, STANDARD
CHARTERED BANK (PAKISTAN) LIMITED,
DANSKE BANK A/S, DANSKE MARKETS INC.,
PLACID NK CORPORATION d/b/a PLACID
EXPRESS, and WALL STREET EXCHANGE LLC,

Defendants.

21 Civ. 4400 (KAM) (RML)

**DECLARATION OF AMIT KUMAR CHOUDHARY
REGARDING WALL STREET EXCHANGE'S OPERATIONS**

DECLARATION OF AMIT KUMAR CHOUDHARY

I, Amit Kumar Choudhary, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury under the laws of the United States of America that the following is true and correct to the best of my knowledge and belief:

1. I am the Chief Financial Officer and acting “Manager in Charge” (as defined under The Standards for the Regulations Regarding Licensing and Monitoring of Exchange Business (v.1.10, February 2018)), at Wall Street Exchange Centre LLC (“Wall Street Exchange”). Originally, Wall Street Exchange was located in Naif Road, Deira, Dubai, United Arab Emirates, relocating in 1999 to 11th Floor, Twin Towers, Baniyas Road, Deira, Dubai, United Arab Emirates, and further relocating in 2014 to Corporate Offices 2201/04, Twin Towers, 22nd Floor, Baniyas Road, Deira, Dubai, United Arab Emirates. In June 2022, Wall Street Exchange relocated to Office No. 3, Deira Al Garhoud, United Arab Emirates, a location owned by Emirates Post Group Company PJSC. As Chief Financial Officer since August 1, 2019, I am familiar with Wall Street Exchange’s provision of foreign exchange services, money remittance services, and payroll processing, as well as its work as a sales agent for several allied products, such as bill payments and telephone cards. Wall Street Exchange’s current operations are limited to the United Arab Emirates.

2. Founded in 1982, Wall Street Exchange is incorporated in the United Arab Emirates and headquartered in Dubai.

3. From 2005 to 2012, 60 percent of Wall Street Exchange was owned by the Emirates Post Group Company PJSC (formerly known as the Emirates Post Group), with the remaining 40 percent held by its founder, Asgar Shakoor Patel. In 2012, Patel sold his shares to Emirates Post Group Company PJSC, which is wholly owned by the United Arab Emirates. From 2012 to date, Wall Street Exchange is wholly owned by the United Arab Emirates through its ownership by the

Emirates Post Group Company PJSC. In 2021, the ownership of Wall Street Exchange Centre LLC by Emirates Post Group Company PJSC was held through an intermediate, United Fintech Solutions LLC, which in turn is wholly owned by the Emirates Post Group Company PJSC.

4. Wall Street Exchange provides foreign exchange, money transfer, and related services. It offers currency exchange, remittance services, and payroll processing, and it acts as a sales agent for several allied products, including bill payments and telephone cards.

5. As part of its foreign exchange and money transfer services, Wall Street Exchange routes U.S. dollars through various locations outside of the United States, including through the United Arab Emirates, Austria, and Singapore.

6. Wall Street Exchange currently has 329 employees. None of Wall Street Exchange's employees are currently located in New York State or anywhere else in the United States. None of its employees were located in New York State or anywhere else in the United States at the time of the underlying events described in this case, or when the case was filed.

7. Wall Street Exchange currently has branches in the Emirates of Abu Dhabi, Dubai, Ajman, Ras El Khaimah, Sharjah, and Umm Al Quwain in the United Arab Emirates. Wall Street Exchange does not currently have any branch or other place of business located in New York State or anywhere else in the United States. Wall Street Exchange did not have any branch or other place of business located in New York State or anywhere else in the United States at the time of the underlying events described in this case, or when the case was filed.

Dated: 29/9/2022.


Amit Kumar Choudhary